IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

RALPH S. JANVEY, IN HIS CAPACITY	§	
AS COURT-APPOINTED RECEIVER FOR	§	
THE STANFORD INTERNATIONAL	§	
BANK, LTD., ET AL. and the OFFICIAL	§	
STANFORD INVESTORS COMMITTEE,	§	
Plaintiffs,	§ § §	Case No. 3:11-cv-00294 JURY DEMANDED
v.	§	
TGC, LLC d/b/a GOLF CHANNEL,	§ § 8	
Defendant.	8	

DEFENDANT TGC, LLC D/B/A GOLF CHANNEL'S MOTION FOR ATTORNEYS' FEES

Pursuant to Rule 54(d)(2) of the Federal Rules of Civil Procedure and the Texas Uniform Fraudulent Transfer Act, Chapter 24 of the Texas Business & Commerce Code ("TUFTA"), Section 24.013, Defendant TGC, LLC d/b/a Golf Channel ("Golf Channel") files its Motion for Attorneys' Fees ("Motion") and in support thereof, would respectfully show the Court as follows:

On November 5, 2013, the Court entered a take-nothing judgment on Plaintiffs' fraudulent transfer claims against Golf Channel in this case (Docket # 94). Golf Channel is entitled to recover its attorneys' fees incurred in the proceedings before this Court and any appeals filed by Plaintiffs. An award of Golf Channel's attorneys' fees is equitable and just under the circumstances. The fees that Golf Channel has incurred and may incur in the future are reasonable and necessary under the standards established by the Supreme Court of Texas and

previously applied by this Court in awarding fees to the Receiver when it prevailed on a

fraudulent transfer claim in another case.

In support of its Motion, Golf Channel relies on: (1) the Brief in Support of Defendant

TGC, LLC d/b/a Golf Channel's Motion for Attorneys' Fees; and (2) the Appendix to Motion for

Attorneys' Fees, each filed contemporaneously herewith, and all Exhibits thereto, which are

collectively incorporated by reference in this Motion pursuant to Federal Rule of Civil Procedure

10(c). Golf Channel further relies on all pleadings, evidence, and matters of record in the above-

referenced caption.

WHEREFORE, PREMISES CONSIDERED, Golf Channel respectfully requests that its

Motion for Attorneys' Fees be in all things granted and for such other relief to which it may

show itself justly entitled.

Respectfully submitted,

/s/ Theodore W. Daniel

Theodore W. Daniel

State Bar No. 05362400

tdaniel@fulbright.com

Attorney-In-Charge

Tricia W. Macaluso

State Bar No. 24013773

tmacaluso@fulbright.com

Kyle M. Schindler

State Bar No. 24066033

kschindler@fulbright.com

OF COUNSEL:

FULBRIGHT & JAWORSKI L.L.P.

Suite 2800

2200 Ross Avenue

Dallas, Texas 75201-2784

Telephone: (214) 855-8000

Facsimile: (214) 855-8200

ATTORNEYS FOR DEFENDANT TGC, LLC

D/B/A GOLF CHANNEL

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2013, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, via hand delivery by permission of the Court. A copy of this document was served upon the following attorneys of record by certified mail, return receipt requested, and by email:

Nicholas A. Foley Douglas J. Buncher Neligan Foley, LLP 325 N. St. Paul, Suite 3600 Dallas, Texas 75201

Telephone: 214-840-5320 Facsimile: 214-840-5301 nfoley@neliganlaw.com dbuncher@neliganlaw.com ATTORNEYS FOR THE OFFICIAL STANFORD INVESTORS' COMMITTEE

Kevin M. Sadler Robert I Howell David T. Arlington BAKER BOTTS L.L.P. 1500 San Jacinto Center 98 San Jacinto Blvd. Austin, Texas 78701-4039

Telephone: 512-322-2500 Facsimile: 512-322-2501 kevin.sadler@bakerbotts.com robert.howell@bakerbotts.com david.arlington@bakerbotts.com ATTORNEYS FOR RECEIVER RALPH S. JANVEY

Timothy S. Durst BAKER BOTTS L.L.P. 2001 Ross Avenue Dallas, Texas 75201

Facsimile: 214-953-6503 tim.durst@bakerbotts.com

Telephone: 214-953-6500

ATTORNEYS FOR RECEIVER RALPH S. JANVEY

Peter D. Morgenstern BUTZEL LONG 22nd Floor 380 Madison Ave. New York, New York 10017 Telephone: 212-374-5379 morgenstern@butzel.com

ATTORNEYS FOR THE OFFICIAL STANFORD INVESTORS COMMITTEE Edward C. Synder CASTILLO SNYDER, P.C. Bank of America Plaza, Suite 1020 300 Convent Street San Antonio, Texas 78205 Telephone: 210-630-4200 Facsimile: 210-630-4210

ATTORNEYS FOR THE OFFICIAL

STANFORD INVESTORS COMMITTEE

Edward F. Valdespino STRASBURGER & PRICE, LLP 300 Convent St., Suite 900 San Antonio, Texas 78205 Telephone: 210-250-6061

esnyder@casnlaw.com

Facsimile: 210-258-2703

Edward.valdespino@strasburger.com

ATTORNEYS FOR THE OFFICIAL STANFORD INVESTORS COMMITTEE

/s/ Theodore W. Daniel

Theodore W. Daniel